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June 6, 2018

**Via ECF**

US DISTRICT COURT, SDNY  
Hon. Denise L. Cote, USDJ  
500 Pearl Street  
New York, NY 10007

RE: US v Mahmoud Thiam  
Sociedad Saboeira d Nacala  
Docket: 17 Cr 0047 (DLC)

Dear Honorable Madame:

As you know, I represented Third-Party Claimant in the above-referenced matter. Please accept this correspondence as a status update and request for further extension of time.

As the Court is aware, the parties were given a deadline of today to inform the Court as to a resolution or to establish a briefing schedule.

The parties have been discussing a possible resolution to the Third-Party Claim. The Government has requested additional documents that I am in the process of obtaining that the parties believe may lead to the final resolution herein.

Accordingly, the parties jointly request an additional extension of sixty (60) days to resolve the matter prior to full briefing schedules. While the parties recognize that the additional sixty (60) days is a lengthy request given prior extensions, I note for the Court's consideration that communications between myself and the Claimant often have lengthy delays due to distance/language and time barriers; as well as the fact that I will be out of the jurisdiction for most of the time-period between July 1 and August 8, 2018.

Thank you for your time and consideration. Should the Court have any further questions, concerns or directives, please feel free to contact the undersigned.

Respectfully submitted,

s/Aaron M. Goldsmith

cc: ELISHA KOBRE, AUSA  
**via ECF**